

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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AMS GROUP et. al,

Case No.: 07 CV-6988 (LTS)

Plaintiffs,

-against-

J.P. MORGAN CHASE INC.

Defendant.

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**PLAINTIFF'S MEMORANDUM OF LAW IN SUPPORT OF DEFENDANTS' MOTION  
FOR SUMMARY JUDGEMENT FOR EQUITABLE TOLLING.**

**By Robert Parker**  
**On the Brief**

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**ATTACHED MEMORANDUM OF LAW**

**POINT I**

**THE STATUTE OF LIMITATIONS ARE EQUITABLY TOLLED**

**POINT II**

**LACK OF DISCOVERY PREVENTS PLAINTIFF FROM ADEQUATELY  
ADDRESSING ISSUES OF DISCRIMINATION**

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**Preliminary Statement**

**Plaintiff hereby submits its supplemental papers, converting the previously filed motion to dismiss into a summary judgment motion.**

**Statement of Facts**

For a recitation of the facts, please refer to Plaintiff's Supplemental Affidavits attached to its motion herein for Plaintiff's 56.1 submissions.

There was no discovery completed in this matter.

See attached Memorandum of Law

**CONCLUSION**

For the foregoing reasons, the Plaintiff respectfully request that this Court grant summary judgment and allow this matter to proceed to a jury trial, and whatever further relief that this Court deems just and proper.

Dated: New York, NY  
July 1, 2008

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